

**REMARKS**

Claims 1-4, 6-14, 16-23 and 25-30 are pending in the application.

Claims 1-4, 6-14, 16-23 and 25-30 have been rejected.

Claims 1, 11, and 21 have been amended.

**Rejection of Claims under 35 U.S.C. § 102(b)**

Claims 1-4, 6-14, 16-23 and 25-30 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Publication 2002/0188711 listing Meyer et al. as the inventors (“Meyer”). Applicants respectfully traverse this rejection. . Applicants respectfully submit that the arguments presented below with respect to independent claim 1 are generally applicable to claims 2-4, 6-14, 16-23 and 25-30, as independent claims 11, 21, and 28 generally require the same disputed limitations of claim 1, and claims 2-4, 6-10, 12-14, 16-20, 22-23, 25-27, and 29-30 depend from respective independent claims. Amended claim 1 recites:

A method comprising:  
 detecting a failure of a first virtualization device of a storage area network interconnect, wherein  
     said storage area network interconnect is coupled to a metadata host,  
     said metadata host is configured to maintain metadata associated with said first virtualization device,  
     said metadata host is configured to monitor a heartbeat signal from a plurality of virtualization devices, and  
     said first virtualization device is associated with a unique interconnect device identifier; and  
 associating said unique interconnect device identifier with a second virtualization device of said storage area network interconnect in response to said detecting, wherein said associating comprises modifying said metadata.

Applicants respectfully submit that the cited passages of Meyer do not disclose each element of independent claim 1. Specifically, the cited passages of Meyer fail to at least, teach “associating said unique interconnect device identifier with a second virtualization device of said storage area network interconnect in response to said

detecting.” The Office Action cites the following passages of Meyer as purportedly disclosing the foregoing feature recited in independent claim 1:

[0149] LC Failover Service

[0150] The VSC Failover Service manages the following:

[0151] 1. Member Management

[0152] a. Member Configuration

[0153] b. Member state management

[0185] 1. Member Configuration—What components are participating in the Set and how are they identified and configured for failover? What reconfiguration options are supported?

[0356] Served Failover Set must also manage all modifications to the set's parameters. The current state machine does not implement this feature, but will attempt to in the future. Modification of the Failover Set parameters will require understanding of their affect on the Set state and will require synchronization of the metadata as well. Modification such as increasing or reducing capacity must also be managed through this path. Meyer, ¶¶ 149-153, 185, and 356 (cited at Office Action, p. 3).

Applicants respectfully submit that the cited portions of Meyer fail to disclose “associating said unique interconnect device identifier with a second virtualization device of said storage area network interconnect in response to said detecting,” as claimed. The cited passages disclose a failover service managing member configuration of components of a failover set. The cited passages also disclose synchronizing “the metadata” as part of modifying a failover set parameters. However, even if either the cited managing set components or modifying set parameters could be equated with “associating a unique interconnect device identifier with a second virtualization device” (a point which Applicants do not concede), the cited passages fail to disclose that either the managing or modifying is performed in response to detecting a failure of a first virtualization device. Meyer instead discloses that each member of a set is assigned the same world wide node name (WWN) when the set is created. Meyer ¶ 597. Thus, Meyer has no need of associating a first device’s unique identifier with a second device in response to a failure, as claimed, since each member of Meyer’s set already has the same WWN.

Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

**CONCLUSION**

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5092.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,



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